

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,		X
	:	
Plaintiff,	:	
	:	
v.	:	11 Civ. 0691 (LAK)
STEVEN DONZIGER, et al.,	:	
	:	
Defendants.	:	
-----		X

**[PROPOSED] ORDER TO SHOW CAUSE FOR AN ORDER REQUIRING THAT
ANYONE CLAIMING PROTECTION OVER MATERIALS
SUBPOENAED FROM DONALD RAFAEL MONCAYO JIMENEZ COME FORTH
AND GIVE REASONS, PRIVILEGES OR OTHERWISE, WHY SUCH DOCUMENTS
SHOULD NOT BE PRODUCED IMMEDIATELY**

WHEREAS, on November 18, 2013, Chevron Corporation (“Chevron”) filed a Motion By Order to Show Cause For an Order Requiring That Anyone Claiming Protection Over Materials Subpoenaed From Donald Rafael Moncayo Jimenez Come Forth And Give Reasons, Privileges Or Otherwise, Why Documents Should Not Be Produced Immediately.

The Court has considered the evidence and arguments presented, and sufficient reason appearing, it is hereby:

ORDERED that Mr. Moncayo’s counsel shall produce all materials responsive to Chevron’s subpoena, and any privilege log, by 12:00 p.m. on November 18, 2013; and

ORDERED that Chevron shall serve counsel for Defendants, EarthRights International, and _____, by hand, facsimile, or e-mail a copy of this Order to Show Cause and all papers submitted in support thereof on or before ____:____ _m. on November __, 2013; and

ORDERED that papers in opposition to the Motion, if any, shall be served and filed electronically on or before __:__ a.m. on November __, 2013; and

ORDERED that reply papers, if any, shall be served and filed electronically on or before __:__ a.m. on November __, 2013; and

ORDERED that Chevron shall sequester any documents over which a timely assertion of particularized privilege or protection is made until such time as the Court resolves the dispute; and

ORDERED that Defendants, EarthRights International, or _____ must show cause before this Court, at the United States District Courthouse, 500 Pearl Street, New York, New York, on _____, November __, 2013 at __:_____.m. why an order should not be entered granting Chevron's Motion by Order to Show Cause for an Order Requiring That Anyone Claiming Protection Over Materials Requested From Donald Rafael Moncayo Jimenez Come Forth And Give Reasons, Privileges Or Otherwise, Why Documents Should Not Be Produced Immediately.

IT IS SO ORDERED.

Dated: New York, New York
November __, 2013

United States District Judge